

**MONTGOMERY McCRACKEN**

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March 7, 2025

The Honorable Evelyn Padin
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Hangang Global Shipping Co. Ltd. v. Delta Corp Shipping Pte Ltd.*
2:24-cv-11111-EP-MAH

Dear Judge Padin,

We represent the Plaintiff Hangang Global Shipping Co. Ltd. (“Hangang”) in the above-captioned action. On behalf of our client Hangang, we write to respectfully request additional time to serve the Complaint on the defendant Delta Corp Shipping Pte Ltd. (“Delta”).

The subject dispute is based on the alleged failure of Delta to pay hire for the use of the vessel M/V MAPLE MARINA. In connection with filing the Complaint, we applied for and obtained, among other things, an Order and a Writ of Maritime Attachment.

We served garnishee bank Valley National on December 19, 2024 with the Complaint, Order and Writ of Maritime Attachment, Order for Appointment of Alternate Process Server, and Interrogatories. To date, the garnishee has informally informed us that money in an amount well below the claimed amount was attached. However, the garnishee bank has not appeared, answered, or responded to the interrogatories in a timely manner.

Delta has a principal place of business in Singapore. Federal Rules of Civil Procedure Rule 4 provides that service on a foreign party can be accomplished under the process provided under the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents. However, this process takes time.

Under these circumstances, we respectfully request additional time for Hangang to serve Delta. Specifically, we propose at least another 90 days, which would make the deadline for service to be on or before June 17, 2025.

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

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MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

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We thank Your Honor in advance for your understanding and assistance. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**Montgomery McCracken
Walker & Rhoads, LLP**
Attorneys for Plaintiff Hangang

/s/ Timothy Semenoro

Timothy Semenoro